

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

GENERAL MAJORITY PAC, a)
Washington, D.C., not for profit)
corporation,)

Plaintiff,)

v.)

CAROL AICHELE, in her official)
capacity as Pennsylvania Secretary of)
State; KATHLEEN KANE, in her)
official capacity as Pennsylvania)
Attorney General; JONATHAN M.)
MARKS, in his official capacity as)
Commissioner of Pennsylvania's)
Bureau of Commissions, Elections)
and Legislation; IAN HARLOW, in)
his official capacity as Deputy)
Commissioner of Pennsylvania's)
Bureau of Commissions, Elections)
and Legislation; and TRISHA)
MALEHORN, in her official capacity)
as Chief of the Division of Campaign)
Finance and Lobbying Disclosure of)
Pennsylvania's Bureau of)
Commissions, Elections and)
Legislation,)

Defendants.)

Civil Action No. 1:14-CV-00332-
WWC

**PLAINTIFF GENERAL MAJORITY PAC'S MOTION FOR JUDGMENT
ON THE PLEADINGS**

Pursuant to Federal Rule of Civil Procedure 12(c), Plaintiff General
Majority PAC ("GMP") hereby moves the Court for entry of an order issuing
judgment on the pleadings and permanently enjoining Defendants from

implementing, enforcing or giving any effect to Title 25, Section 3252(a) of the Pennsylvania Election Code's prohibition on contributions to political committees by corporations, unincorporated associations, or unions, as applied to political committees, like GMP, that make only independent expenditures and do not make contributions to, or coordinated expenditures with, candidates or party committees, as those terms are defined under Pennsylvania law. As set forth in the accompanying brief in support, there are no material issues of fact in dispute, and GMP is entitled to judgment as a matter of law.

In accordance with Local Rule 5.1(g), GMP submits a proposed order for the Court's consideration together with this motion. In accordance with Local Rule 7.1, GMP has sought concurrence in the motion with Defendants and has been advised that, although Defendants do not intend to defend against the underlying merits of the claims raised by GMP, they object to GMP's proposed order and therefore will not concur in the motion. GMP thus also submits a certificate of non-concurrence.

Dated: July 2, 2014

Respectfully submitted,

By/s/ Mark A. Aronchick
HANGLEY ARONCHICK SEGAL
PUDLIN & SCHILLER

Mark A. Aronchick
(PA. ID No. 20261)
maronchick@hangley.com

Matthew A. Hamermesh
(PA. ID No. 82313)
mhamermesh@hangley.com

One Logan Square
27th Floor
Philadelphia, PA 19103
Telephone: (215) 568-6200
Facsimile: (215) 568-0300

and

PERKINS COIE LLP
Marc E. Elias (Admitted *Pro Hac Vice*)
D.C. Bar No. 442007

melias@perkinscoie.com
Elisabeth C. Frost (Admitted *Pro Hac Vice*)

D.C. Bar No. 1007632
efrost@perkinscoie.com
700 Thirteenth St., N.W., Suite 600

Washington, D.C. 20005-3960
Telephone: (202) 654-6200
Facsimile: (202) 654-6211

Counsel for Plaintiff

CERTIFICATE OF NON-CONCURRENCE

The undersigned hereby certifies that counsel for Defendants was contacted regarding Defendants' possible concurrence in Plaintiff General Majority PAC's ("GMP") Motion for Judgment on the Pleadings (the "Motion"). In response, counsel for Defendants advised that, while Defendants do not intend to defend against the underlying merits of the claims raised by GMP, Defendants object to GMP's proposed order and will therefore not concur with the Motion.

Dated: July 2, 2014

Respectfully submitted,

By /s/ Mark A. Aronchick
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(PA. ID No. 20261)
maronchick@hangleys.com
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(PA. ID No. 82313)
mhamermesh@hangleys.com

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efrost@perkinscoie.com
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Counsel for Plaintiff

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CERTIFICATE OF SERVICE

I hereby certify that on July 2, 2014, I electronically filed the foregoing document with the United States District Court for the Middle District of Pennsylvania by using the CM/ECF system, and that the filing is available to

counsel for all parties for downloading and viewing from the electronic filing system.

Date: July 2, 2014

By /s/ Mark A. Aronchick
HANGLEY ARONCHICK SEGAL
PUDLIN & SCHILLER
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